

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100009-2018**  
Application Received: **June 12, 2017**  
Plant Identification Number: **03-54-04100009**  
Permittee: **Equitrans, L.P.**  
Facility Name: **Copley Run Compressor Station #70**  
Mailing Address: **Route 4, Box 640 Weston, WV 26452**

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Physical Location: Weston, Lewis County, West Virginia  
UTM Coordinates: 541.30 km Easting • 4314.80 km Northing • Zone 17  
Directions: Interstate 79 to Exit 91. Proceed toward Weston for approximately 1 mile, take a left onto Copley Road (Route 17). The station is approximately ½ mile on the left.

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### Facility Description

Copley Run Compressor Station #70 is a natural gas transmission facility covered under Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week. This station consists of three (3) 1350 hp compressor engines, one (1) 2250 hp compressor engine, one (1) 1800 hp compressor engine, one (1) 2.2 MMBtu/hr natural gas fired electric generator, one (1) 150 KW Kohler 150REZGC Generator, one (1) 1.63 MMBtu/hr natural gas fired hot water boiler, one (1) 0.03 MMBtu/hr natural gas fired hot water heater, one (1) 2.1 MM Btu/hr inline gas heater, two (2) triethylene glycol dehydration units, one (1) flare and six (6) tanks of various sizes.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Carbon Monoxide (CO)	167.03	80.4
Nitrogen Oxides (NO <sub>x</sub> )	530.35	323.2
Particulate Matter (PM <sub>2.5</sub> )	12.81	7.2
Particulate Matter (PM <sub>10</sub> )	12.81	7.2
Total Particulate Matter (TSP)	12.81	7.2
Sulfur Dioxide (SO <sub>2</sub> )	0.18	0.1
Volatile Organic Compounds (VOC)	59.41	28.9

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Formaldehyde (HCHO)	14.31	8.1
Other HAPs	17.53	1.0
Total HAPs	31.84	9.1

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 167.03 tpy of CO; 530.35 tpy of NO<sub>x</sub>; and 14.31 tpy of formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, and over 10 tons per year of a single HAP, and over 25 tons per year of total HAPs, Equitrans L.P.'s Copley Run Compressor Station #70 is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2 45CSR6 45CSR11 45CSR13 45CSR16	Opacity and PM limits for fuel burning units Open burning prohibited. Standby plans for emergency episodes. New Source Review Permit requirements Emission standards for New Stationary Sources pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.

45CSR30 45CSR34  40 C.F.R. Part 61 40 C.F.R. 63 Subpart HH 40 C.F.R. Part 60, Subpart JJJ  40 C.F.R. 63 Subpart ZZZZ 40 C.F.R. Part 64 40 C.F.R. Part 82, Subpart F	Operating permit requirement. Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63 Asbestos inspection and removal Natural Gas Production Facilities MACT NSPS for Stationary Spark Ignition Internal Combustion Engines RICE MACT Compliance Assurance Monitoring Ozone depleting substances
State Only:	45CSR4  No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-2397C	4/8/2016	
G60-C085	2/25/2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

Per company's request, in the Emission Units Table, Emission Unit ID- G-001 was replaced by one (1) 150 KW Kohler 150REZGC Generator (Emission Unit ID-G-003) and Emission Unit ID- 003-01 was replaced by Emission Unit ID- 003-01a. The generator (G-003) was permitted under G60-C085.

Per company's email on March 29, 2018, the Emission Point IDs-C-004, C-005, 003-03 and 004-02 are classified as transmission and everything else at the facility is classified as gathering. The facility is major for title V purposes because the PTE of NOx and CO are greater than 100 tpy. The facility is also a HAP major source since facility-wide formaldehyde is greater than 10 tpy and total HAPs are greater than 25 tons per year. Each of the applicable NEHAPS (40 CFR 63), however, limit the major/area designations to sources defined in each individual rule. Copley Run is defined as an area source under subparts HH, HHH, and ZZZZ as explained below:

**40 C.F.R. 63 Subpart HHH** –This Subpart applies to such units at natural gas transmission and storage facilities that are major sources of HAP emissions located downstream of the point of custody transfer (after processing and/or treatment in the production sector), but upstream of the distribution sector. Subpart HHH defines a “major source” as having the same meaning as in §63.2, except that: (1) Emissions from any pipeline compressor station or pump station shall not be aggregated with emissions from other similar units, whether or not such units are in a contiguous area or under common control; and (2) Emissions from processes, operations, and equipment that are not part of the same facility, as defined in this section, shall not be aggregated.

The Copley Run Compressor Station stores and transmits natural gas prior to delivery to end users. The compressor engines 001-04 and 001-05 and the storage dehy are engaged in compressing natural gas into a transmission pipeline system or dehydrating natural gas exiting a storage field prior to entering a transmission pipeline system. HAP emissions from these emissions units are less than the major source thresholds, and as such, the Copley Run Compressor Station is a minor (area) source of hazardous air pollutants. Therefore, the requirements of this subpart do not apply to the Copley Run Compressor Station.

**40 C.F.R. 63 Subpart HH**-This Subpart contains requirements for both major and area sources of HAP. Dehy Unit #1 (004-01) at the Copley Run Compressor Station can process field gas from production gathering lines entering the site and the facility is considered an area source of HAP since it does not meet the definition of a major source in 40 CFR §63.761 (Subpart HH defines a “major source” as having the same meaning as in §63.2, except that: (3) *For facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination*). Therefore, Dehy Unit #1 is subject to the requirements for area sources under Subpart HH when processing production field gas.

The benzene emissions from Dehy Unit #1 are less than 0.90 megagrams per year (1 tpy), therefore, the Copley Run Compressor Station is exempt from the requirements of NESHAP Subpart HH pursuant to 40 CFR §63.764(e)(1)(ii), except for the requirement to keep records of the actual average natural gas flow rate or actual average benzene emissions from the dehydrator, per 40 CFR §63.774(d)(1). The company will continue to comply with the requirements of Subpart HH as outlined in the current permit.

**40 C.F.R. 63 Subpart ZZZZ**-The Copley Run Compressor Station is not a major source of hazardous air pollutants (HAPs) under the definition in 40 CFR §63.6675.

*“Major Source, as used in this subpart, shall have the same meaning as in §63.2, except that:*

*(1) Emissions from any oil or gas exploration or production well (with its associated equipment (as defined in this section)) and emissions from any pipeline compressor station or pump station shall not be aggregated with emissions from other similar units, to determine whether such emission points or stations are major sources, even when emission points are in a contiguous area or under common control;*

*(2) For oil and gas production facilities, emissions from processes, operations, or equipment that are not part of the same oil and gas production facility, as defined in §63.1271 of subpart HHH of this part, shall not be aggregated;*

*(3) For production field facilities, only HAP emissions from glycol dehydration units, storage vessel with the potential for flash emissions, combustion turbines and reciprocating internal combustion engines shall be aggregated for a major source determination; and*

*(4) Emissions from processes, operations, and equipment that are not part of the same natural gas transmission and storage facility, as defined in §63.1271 of subpart HHH of this part, shall not be aggregated.”*

Dehy Unit #004-02 (Storage Dehy) and Compressor engines # 001-04 and # 001-05 are part of the natural gas transmission and storage facility as discussed in the subpart HHH section above. The PTE for the transmission and storage part of the facility is less than the 10/25 tpy HAPs major source threshold and therefore # 001-04 and # 001-05 are regulated as area sources under this subpart.

The remainder of the equipment at the site (i.e. Dehy #004-01, Compressor engines #001-01, #001-02, #001-03, Emergency generators #G-002 and #G-003 and the storage tanks are part of the gathering system (i.e. production field facilities). The PTE for the gathering part of the facility is also less than the 10/25 tpy HAPs major source threshold. Therefore, engines #001-01, #001-02 and #001-03 and generators #G-002 and #G-003 are also regulated as area sources under this subpart.

In the previous permit renewal R30-04100009-2012, the compressor engines (Emission Point IDs- C-001 through C-005) were classified as non-emergency SI 2SLB units > 500 hp installed prior to 12/19/2002 located at a major source. As such, there were no requirements for those under 40 C.F.R. 63 Subpart ZZZZ per §§63.6590(b)(3)(i) and 63.6600(c). Per company’s explanation through email on March 29, 2018, the compressor engines are actually subject to the requirements for existing, spark-ignition, nonemergency, 2-stroke, lean-burn RICE greater than 500 hp at an area source. The applicable requirements were added to section 5 of this permit. Per 40 CFR §63.6625(h), the company will minimize the amount of time the engines spend at idle and minimize the engines’ startup period, not to exceed thirty (30) minutes. Equitrans will also adhere to the work practice standards in Table 2d of Subpart ZZZZ.

and maintain records that show these standards have been met, including changing the oil and filter and inspecting and replacing as necessary the spark plugs, hoses and belts every 4,320 hours of operation or annually, whichever comes first.

The generator engine (G-002) has similar requirements, with oil and filter changes and hose and belt inspections every 500 hours of operation or annually, whichever comes first, and inspecting spark plugs every 1,000 hours of operation or annually, whichever comes first. In the previous Title V permit, this engine was classified as an emergency SI RICE at a major source. The requirements were changed to reflect that the engine is an emergency SI RICE at an area source.

The Kohler emergency generator engine (G-003) at the Copley Run Compressor Station is a new area source emergency RICE less than 500 hp. New area source emergency stationary RICE less than 500 hp are required to meet the requirements of this MACT standard by meeting the applicable requirements of the applicable New Source Performance Standard in 40 CFR 60 (Subpart IIII for compression ignition engines and Subpart JJJJ for spark ignition engines). No Further requirements apply to such engines under NESHAP Subpart ZZZZ. The Kohler emergency generation will comply with Subpart ZZZZ by complying with 40 CFR 60 Subpart JJJJ.

**40 C.F.R. 60 Subpart JJJJ** - The Kohler emergency generator engine (G-003) is a four stroke lean burn spark ignition engine manufactured after July 1, 2008 and is subject to Subpart JJJJ. The generator is certified to meet the emergency stationary RICE emission standards in Table 1 of Subpart JJJJ. The applicable requirements were added in Section 9 of this permit. The requirements and citations of the General Permit G60-C and General Permit Registration G60-C085 were incorporated into this section

**40 C.F.R. Part 64-** The only changes since the renewal permit R30-04100009-2012 was the installation of a new emergency generator(G-003), which does not trigger a CAM review as this engine does not have a control device.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40 CFR part 60 Subpart Dc - The boilers at Copley Run station are below 10 mmBtu/hr.
- b. 40 CFR part 60 Subpart GG - There are no turbines at Copley Run station.
- c. 40 CFR part 60 Subparts K, Ka - All tanks at Copley Run station are less than 40,000 gallons in capacity.
- d. 40 CFR part 60 Subpart KKK - Copley Run station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
- e. 40 CFR part 60 Subpart LLL - There are no sweetening units at Copley Run station.
- f. 40 CFR part 60 Subpart IIII - The engines at Copley Run Station are not stationary compression ignition (CI) internal combustion engines (ICE).
- g. 45CSR27 - Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

None

**Comment Period**

Beginning Date: Wednesday, April 25, 2018  
Ending Date: Friday, May 25, 2018

**Point of Contact**

All written comments should be addressed to the following individual and office:

Beena Modi  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478  
Beena.j.modi@wv.gov

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

N/A